

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

CITY OF LAKELAND EMPLOYEES	)	Case No. 1:10-cv-06016
PENSION PLAN, Individually and on Behalf	)	
of All Others Similarly Situated,	)	<u>CLASS ACTION</u>
	)	
Plaintiff,	)	Judge John J. Tharp, Jr.
	)	
vs.	)	
	)	
BAXTER INTERNATIONAL INC., et al.,	)	
	)	
Defendants.	)	
	)	
	)	

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LEAD PLAINTIFF'S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS  
ACTION SETTLEMENT

1. Lead Plaintiff National Elevator Industry Pension Fund hereby moves the Court for entry of an Order: (1) preliminarily approving the Settlement Agreement dated August 11, 2015; (2) certifying the Class for settlement purposes; (3) approving the form and method for providing notice of the settlement to Class Members; and (4) scheduling a final Settlement Hearing.

2. This motion is based upon the Settlement Agreement and all Exhibits attached thereto, the Memorandum of Points and Authorities in Support of Lead Plaintiff's Unopposed Motion for Preliminary Approval of Class Action Settlement, the Declaration of Peter Crudo Regarding Notice and Administration, the [Proposed] Order Preliminarily Approving Settlement and Providing for Notice ("Notice Order"), all other pleadings and matters of record, and such additional evidence or argument as may be presented at the hearing.

Accordingly, Lead Plaintiff requests that the Court enter the Notice Order, a copy of which is attached hereto.

DATED: August 11, 2015

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on August 11, 2015, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on August 11, 2015.

s/ Robert J. Robbins

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## Mailing Information for a Case 1:10-cv-06016 City of Lakeland Employees Pension Plan v. Baxter International Inc. et al

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### Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

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